



**Chemical
Corporation**
A Subsidiary of ICC Industries Inc.

201-15231

3676 Davis Road N.W. • P.O. Box 40 • Dover, Ohio 44692 • (330) 343-7711 • 1-800-321-8805 • Fax: (330) 364-9626

May 4, 2004

Administrator
US Environmental Protection agency
Attn: Chemical Right-to-Know Program
P.O. box 1473
Merrifield VA 22116

RECEIVED
OPPT 0310
04 MAY -5 PM 1:02

Dear Ladies and Gentlemen:

The following responds to EPA's April 12, 2004 letter regarding the status of Dover Chemical Corporation's HPV commitment for the following compounds:

CAS Number	Name
61788-76-9	Alkanes, chloro
63449-39-8	Paraffin waxes and Hydrocarbon waxes, chloro
68527-02-6	Alkenes, C12-24, chloro
68920-70-7	Alkanes, C6-18, chloro

The compounds are being addressed by Dover through membership in the Chlorinated Paraffins Industry Association (CPIA). Please refer to the February 28, 2002 letter from the CPIA (log #201-13652; <http://www.epa.gov/chemrtk/c13652.htm>) which notifies the Agency that the short- and mid-chain chlorinated paraffins are being addressed as part of the OECD SIDS program while the long-chain chlorinated paraffins is being covered through the ICCA HPV Program with the United Kingdom serving as the lead sponsoring country.

I trust that this provides the needed clarification.

Please contact Bob Fensterheim (CPIA Executive Director, 202-419-1500, bobf@regnet.com) or me (330-365-3604, dave.rankin@doverchem.com) if we can provide any further clarification.

Regards,

David L. Rankin
VP Environmental Affairs

DLR/djl

cc: Bob Fensterheim